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To: [Jay Field](#)
Cc: [Benjamin Shorr](#); [Mary Baker](#); [Eric Blischke/R10/USEPA/US@EPA](#)
Subject: R3 data gaps/issues for discussion with LWG
Date: 06/21/2007 01:24 PM
Attachments: [Round3BDataGapsEPAtoLWG061407.ppt](#)

Hey Jay,

As promised, here are the issues related to benthic risk that will potentially require further discussion. These were identified in a meeting with LWG last week to discuss remaining round 3 data gaps.

- LWG objects to the inclusion of the Hyalella growth endpoint in the toxicity results and predictive models. Still.
- RD/RA vs FS for additional data iterations - how fine a delineation is required for FS. LWG would like to discuss potentially pushing some benthic data gaps into FS and/or RD/RA.
- Bioassays to confirm model results where bioassays do not exist. LWG's rationale in locating their proposed bioassay stations was to confirm predictive results where no bioassay data exist. It is possible there will be additional discussion to rectify their approach with the approach we used, which accepts model results where the LRM and FPM agree.

I've also attached the ppt that Eric put together for the meeting. the full universe of issues identified for benthic risk, biota, and transition zone water are included. The benthic risk issues (listed above) are highlighted in a dingy yellow.

I'll keep y'all posted on when it looks as though there may be some movement on resolving the benthic data gaps issues with LWG. Biota and TZW are the priorities right now, and it may take another week or two or three to work through those.

Talk to you soon.

-R